

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
)
)
PLAINTIFF,)
)
)
V.) CV-09-BE-2423-E
)
)
JAMES J. STRICKER, et al.,) UNOPPOSED
)
)
DEFENDANTS.)
)

**DEFENDANTS TRAVELERS COMPANIES, INC. AND
AMERICAN INTERNATIONAL GROUP INC.'S MOTION TO EXTEND
TIME TO FILE RESPONSIVE PLEADING**

Defendants The Travelers Indemnity Company (incorrectly named as Travelers Companies, Inc. d/b/a The Travelers Indemnity Company) and American International Group, Inc. ("Movants"), by and through their counsel of record, respectfully move this Court to enter an Order extending the time to file responsive pleadings by thirty (30) days, and as grounds for that motion state as follows:

1. The current deadline for Movants to file their responsive pleadings is April 5, 2010. (Court Order dated February 25, 2010 (no Doc. #).)
2. Although this deadline was already extended from the original deadline, there is good cause for the deadline to be extended further.
3. As the Movants advised the Court in their last motion for an extension, they have been working with the Plaintiff United States of America (the

“Government”) to determine whether the Movants should remain as parties to this litigation. The Government and the Movants met in an in-person meeting in Washington, D.C. earlier this month. Since then, the Movants have been gathering documents requested by the Government, which are to be provided under a Confidentiality Agreement that is currently being negotiated.

4. Additionally, the Movants have been in the process of securing legal representation in this matter by Arent Fox, LLP; however, the engagement process has not yet been completed and formalized.

5. Finally, spring break travel schedules of attorneys for both the Movants and the Government have hampered the Movants’ ability to move forward more quickly in their negotiations with the Government, as well as their ability to formulate an appropriate responsive pleading by April 5, 2010.

6. By email dated March 30, 2010, Counsel for the Government consented to this requested extension.

7. The requested extension would not materially or substantially alter the progress of the case but would, instead, meet the goals of justice and judicial economy.

8. The Movants are deeply respectful of the Court’s schedule and recognize the need to keep cases moving along at an appropriate pace. The Movants are also keenly aware that this is not the first such extension they have

sought. However, the Movants sincerely believe that this extension – which, most importantly, will allow for further meaningful discussions with the Government – may prompt and facilitate efficiencies for the Court and this matter in a broader sense. As this is a complex case with numerous parties, allowing additional time to ensure any unnecessary parties and claims are disposed of (to the extent possible) will surely improve the expediency of future proceedings.

Movants therefore respectfully request this Court to enter an Order extending the time to file responsive pleadings in this matter thirty (30) days from April 5, 2010 to May 5, 2010.

Respectfully submitted,

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